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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,
20 Plaintiff,
21 v.
22 UBER TECHNOLOGIES, INC.,
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,
24 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ESTHER KIM
CHANG IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFF WAYMO LLC'S
MOTION FOR PRELIMINARY
INJUNCTION**

Date: May 3, 2017
Time: 7:30 a.m.
Ctrm: 8, 19th Floor
Judge: The Honorable William Alsup

Trial Date: October 2, 2017

1 I, Esther Kim Chang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in
3 good standing of the Bar of the State of California. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Defendant's Opposition to Plaintiff's Motion
6 for Preliminary Injunction.

7 2. To comply with this Court's March 16, 2017, Order, we interviewed 86 Uber
8 employees who worked at Google in order to identify any Waymo or Google documents.

9 3. Attached hereto as Exhibit 1 is a true and correct copy of a Bloomberg Technology
10 article entitled "Uber Hires Veteran NASA Engineer to Develop Flying Cars" dated Feb. 6, 2017
11 from [https://www.bloomberg.com/news/articles/2017-02-06/uber-hires-veteran-nasa-engineer-to-](https://www.bloomberg.com/news/articles/2017-02-06/uber-hires-veteran-nasa-engineer-to-develop-flying-cars)
12 [develop-flying-cars](https://www.bloomberg.com/news/articles/2017-02-06/uber-hires-veteran-nasa-engineer-to-develop-flying-cars).

13 4. Attached hereto as Exhibit 2 is a true and correct copy of the "Our Story" page
14 from <https://www.uber.com/our-story>.

15 5. Attached hereto as Exhibit 3 is a true and correct copy of the "Rethinking
16 transportation" page from <https://newsroom.uber.com/rethinking-transportation>.

17 6. Attached hereto as Exhibit 4 is a true and correct copy of relevant pages from the
18 deposition of Tim Willis taken on March 23, 2017.

19 7. Attached hereto as Exhibit 5 is a true and correct copy of relevant pages from the
20 deposition of Gary Brown taken on March 24, 2017.

21 8. Attached hereto as Exhibit 6 is a true and correct copy of relevant pages from the
22 deposition of Michael Janosko taken on March 23, 2017.

23 9. Attached hereto as Exhibit 7 is a true and correct copy of relevant pages from the
24 deposition of Pierre-Yves Droz taken on March 31, 2017.

25 10. Attached hereto as Exhibit 8 is a true and correct copy of a letter from the Nevada
26 Department of Motor Vehicles dated March 15, 2017.

1 I declare under the penalty of perjury under the laws of the United States that the
2 foregoing is true and correct. Executed this 7th day of April, 2017, in San Francisco, California.

3
4 /s/ Esther Kim Chang

ESTHER KIM CHANG

5
6
7 **ATTESTATION OF E-FILED SIGNATURE**

8 I, Arturo J. González, am the ECF User whose ID and password are being used to file this
9 Declaration. In compliance with General Order 45, X.B., I hereby attest that Esther Kim Chang
10 has concurred in this filing.

11 Dated: April 7, 2017

/s/ Arturo J. González

Arturo J. González